

James B. Wright
Senior Attorney
Wake Forest, North Carolina 27587-5900
Telephone: 919-554-7587
Fax: 919-554-7913

January 11, 2001

Mr. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE:

UTSE Motion for Extension of Time to

File a Payphone-Specific Cost Study

Docket No. 97-00409

Dear Mr. Waddell:

Enclosed are an original and thirteen copies of the Motion of United Telephone-Southeast, Inc. for an extension of time to file a payphone-specific cost study as directed by the Tennessee Regulatory Authority in its Directors' Conference held December 19, 2000.

Please bring this matter to the attention of the Directors.

Very truly yours,

James B. Wright

Enclosure

C:

Parties of Record Tom Sokol Dennis Wagner Laura Sykora Kaye Odum

## CERTIFICATE OF SERVICE; DOCKET 97-00409

(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on January 11, 2001 the foregoing Motion of United Telephone-Southeast, Inc. was served upon the following parties of record by fax or by depositing in the U.S mail addressed as follows:

Richard Collier Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Tim Phillips Consumer Advocate Division 425 Fifth Avenue North, 2nd Fl. Nashville, TN 37243

Guy M. Hicks BellSouth Telecommunications 333 Commerce St., Suite 2101 Nashville, TN 37201-3300

John Adams Citizens Telecom 1400 16th St., NW, #500 Washington, DC 20036

Henry Walker Boult, Cummings, Conner & Berry 414 Union Street, Suite 1600 Nashville, TN 37219

Jon E. Hastings Boult, Cummings, Conner & Berry 414 Union Street, Suite 1600 Nashville, TN 37219-1777 Ted G. Pappas Bass, Berry & Simms 2700 First American Center Nashville, TN 37238

Guilford R. Thornton, Jr. Esq. Stokes & Bartholomew 424 Church St, Suite 2800 Nashville, TN 37219-2386

James P. Lamoureux AT&T Communications 1200 Peachtree Street, Room 4060 Atlanta, Georgia 30309

Val Sanford Gullett, Sanford, Robinson & Martin 230 Fourth Avenue, North, 3rd Floor Nashville, TN 37219-8888

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James B. Wright

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

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## **UTSE MOTION FOR EXTENSION OF TIME**

United Telephone-Southeast, Inc. ("UTSE") hereby requests the Tennessee Regulatory Authority ("TRA") for an extension of time to file a payphone-specific cost study as directed by the TRA in its Directors' Conference held December 19, 2000. UTSE requests an extension of time to March 6, 2001 in order to complete its payphone cost study.

UTSE originally filed a payphone embedded cost study and supported that study throughout Docket No. 97-00409. On December 19, 2000, UTSE was directed to file a payphone-specific cost study consistent with the methodology adopted for BellSouth and Citizens by February 2, 2001. [Directors' Conference Transcript at p. 19].

UTSE does not have an existing payphone study that would comply with the TRA directive and cannot complete a payphone-specific cost study consistent with the methodology adopted for BellSouth and Citizens within the 46 day time-frame allotted by the TRA. UTSE is starting from square one in developing a new payphone cost study in Tennessee in many respects. Although UTSE has a forward-looking methodology in place, UTSE needs adequate time to update certain elements within its cost models and time to utilize the results to produce a payphone-specific, forward-looking cost study. Thus, UTSE requests additional time to file an accurate, current payphone-specific cost study.

Wherefore, UTSE asks that it be granted an extension of time to March 6, 2001 to file a payphone specific cost study.

> Respectfully Submitted, United Telephone-Southeast, Inc.

By: James B Wueft

James B. Wright

Senior Attorney

14111 Control 17

14111 Capital Boulevard Wake Forest, NC 27587 Telephone: 919-554-7587